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Document Control Sheet

Sheet Title:	AIR NSR 41 BP
Box ID:	5694
Control Sheet ID:	0000-0000-0005-4644
Record Series Name:	AIR / New Source Review Permit
Record Series:	AIR NSR
Primary ID:	100788959
Secondary ID:	7711A
Doc Type:	Permits
Security:	Public
Date:	3/16/2018
Title:	Working File Folder
Tertiary ID	281345

[Return to Shared](#)**03/09/2018 -----NSR IMS - PROJECT RECORD -----**

PROJECT#: 281345 **STATUS:** PENDING
PROJECT ADMIN NAME: BLOWSTILL T26 REPLACEMENT PROJECT
PROJECT TECH NAME: ASPHALT ROOFING MANUFACTURING FACILITY

PROJECT ACTIONS

Permit	Action Type	Permit Type	Received Date	Permit Status	Renewal Date	Action Status	Complete Date
7711A	REVISION	CONSTRUCT	02/09/2018	EFFECTIVE	11/25/2024	PENDING <i>Denied</i>	<i>03/16/18</i>

Assigned Team: MECHANICAL TEAM**STAFF ASSIGNED TO PROJECT:**

HARVILLE, JENNIFER	- REVIEWR1_2 -	AP INITIAL REVIEW
STUMP, STEVEN	- REVIEW ENG -	MECHANICAL TEAM

COMPANY INFORMATION

Issued To	Company Name	Customer Reference Number
BUILDING MATERIALS INVESTMENT CORPORATION	Building Materials Investment Corporation	CN605251487

- CONTACT INFORMATION

Contact Type	Name	Title	Organization Name
RESPONSIBLE OFFICIAL	MR BRUCE DAHLGREN	PLANT MANAGER	BUILDING MATERIALS INVESTMENT CORPORATION

Phone	FAX	Address
(214) 637-8970	(214) 637-5202	2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

EMAIL: BRUCE.DAHLGREN@GAF.COM

Contact Type	Name	Title	Organization Name
TECHNICAL CONTACT	MR KEVIN BUSH	SR ENVIRONMENTAL ENGINEER	BUILDING MATERIALS INVESTMENT CORPORATION

Phone	FAX	Address
(972) 872-2325	(214) 637-5202	2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

EMAIL: KEVIN.BUSH@GAF.COM**PERMIT INFORMATION****REGULATED ENTITY NUMBER: RN100788959**

RECEIVED
APR 11 2018
TCEQ
CENTRAL FILE ROOM

Permit	Account	Permittee Name	County	Region	City	State	Location
7711A	DB0378S	GAF MATERIALS	DALLAS	REGION 04 - DFW METROPLEX	DALLAS	TEXAS	2600 SINGLETON BLVD DALLAS TX 75212

- PERMIT AFFILIATION:

Permit1	Related Permit 2	Relationship Type	Start Date
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PROJECT NOTES:

02/13/2018 SOS 02/13/2018 NO APWL DFC

- PERMIT NOTES:

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL
 06/15/2017 AS REFERENCED IN 30 TAC § 116.116(D)(2), ALL CHANGES AUTHORIZED UNDER PBR 147140 TO A PERMITTED FACILITY SHALL BE INCORPORATED INTO THE NSR PERMIT NO. 7711A WHEN IT IS AMENDED OR RENEWED.

- TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	02/09/2018	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	02/13/2018	
PROJECT RECEIVED BY ENGINEER (DATE)	02/14/2018	
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)	03/09/2018	
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)	03/09/2018	
CENTRAL REGISTRY UPDATED		
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)		
DEFICIENCY CYCLE		
DRAFT PERMIT RFC SENT TO REGION (DATE)		
EMISSIONS MODELING CYCLE DONE BY APPLICANT		
ENHANCED ADMINISTRATIVE OR APPLICATIONS REVIEW (EAR)		
FINAL PACKAGE REWORK CYCLE		
MODELING AUDIT CYCLE		
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)		
WORKING DRAFT PERMIT REVIEW CYCLE		
WPO FINAL PACKAGE CYCLE		

UNIT TYPES:**- Permit Unit Type:**

Industry Group	Industry Type	Source Type	Control/BACT Type	Start Date	End Date
MECHANICAL	ASPHALT ROOFING			01/26/2009	

Permit Alteration Source Analysis & Technical Review

Company	Building Materials Investment Corporation	Permit Number	7711A
City	Dallas	Project Number	281345
County	Dallas	Regulated Entity Number	RN100788959
Project Type	Revision	Customer Reference Number	CN605251487
Project Reviewer	Steven Stump		
Site Name	Asphalt Roofing Manufacturing Facility		

Project Overview

Building Materials Investment Corporation requested an alteration of their permit which authorizes an asphalt roofing manufacturing facility. The company requested authorization of replacing an existing asphalt blowstill with a new larger blowstill, but with no requested increases in throughput or emissions. However, an asphalt blowstill is considered a source of emissions and installing a new blowstill is not allowed under a permit alteration. The company was informed on February 20, 2018 via email and phone conference of the decision to deny this alteration, and the company indicated understanding of the reason for the alteration voidance. The company submitted an amendment on February 27, 2018 to authorize the new blowstill.



3/9/2018

Project Reviewer
Steven Stump

Date



Team Leader Joel Stanford for
Bonnie Evridge

03/12/18

Date

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 16, 2018

MR KEVIN BUSH
ENVIRONMENTAL ENGINEER
BUILDING MATERIALS INVESTMENT CORPORATION
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Alteration
Permit Number: 7711A
Building Materials Investment Corporation
Asphalt Roofing Manufacturing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN605251487.

Dear Mr. Bush:

This is in response to your letter received February 9, 2018, requesting alteration of the conditions and maximum allowable emission rates table (MAERT) of the above-referenced permit. The requested authorization of a replacement blowstill cannot be completed under a permit alteration. We understand that you have submitted a permit amendment request to authorize the replacement unit.

Please notice that the changes you have described require a review under Title 30 Texas Administrative Code § 116.116(b). Upon review of the information submitted in your letter, we are unable to recommend approval of your request for a permit alteration.

If you need further information or have any questions, please contact Mr. Steven Stump at (512) 239-6107 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

[Return to Sharenet](#)**02/13/2018 -----NSR IMS - PROJECT RECORD -----**

PROJECT#: 281345 **PERMIT#:** 7711A **STATUS:** PENDING **DISP CODE:** _____
RECEIVED: 02/09/2018 **PROJTYPE:** REVISION **AUTHTYPE:** CONSTRUCT **ISSUED DT:** _____
RENEWAL: 11/25/2024
PROJECT ADMIN NAME: BLOWSTILL T26 REPLACEMENT PROJECT
PROJECT TECH NAME: ASPHALT ROOFING MANUFACTURING FACILITY

Assigned Team: MECHANICAL TEAM**STAFF ASSIGNED TO PROJECT:**

HARVILLE , JENNIFER - REVIEWR1_2 - AP INITIAL REVIEW
TEAM LEADER , MECHANICAL - REVIEW ENG - MECHANICAL TEAM

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: BUILDING MATERIALS INVESTMENT CORPORATION
COMPANY NAME: Building Materials Investment Corporation
CUSTOMER REFERENCE NUMBER: **CN605251487**

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: **RN100788959** **ACCOUNT:** DB0378S
PERMIT NAME: GAF MATERIALS

REGULATED ENTITY LOCATION: 2600 SINGLETON BLVD
REGION 04 - DFW METROPLEX **NEAR CITY:** DALLAS **COUNTY:** DALLAS

CONTACT DATA

CONTACT NAME: MR KEVIN BUSH **CONTACT ROLE:** RESPONSIBLE OFFICIAL
JOB TITLE: ENVIRONMENTAL ENGINEER **ORGANIZATION:** BUILDING MATERIALS INVESTMENT CORPORATION
MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738
PHONE: (214) 637-8933 Ext: 0
FAX: (214) 637-5202 Ext: 0
EMAIL: KBUSH@GAF.COM

CONTACT NAME: MS LATHA KAMBHAM **CONTACT ROLE:** TECHNICAL CONTACT
JOB TITLE: MANAGING CONSULTANT **ORGANIZATION:** TRINITY CONSULTANTS
MAILING ADDRESS: 12700 PARK CENTRAL DR STE 2100, DALLAS, TX, 75251-1546
PHONE: (972) 661-8100 Ext: 0
FAX: (972) 385-9203 Ext: 0
EMAIL: LKAMBHAM@TRINITYCONSULTANTS.COM

PROJECT NOTES:

02/13/2018 SOS 02/13/2018 NO APWL DFC

PERMIT NOTES:

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL
06/15/2017 AS REFERENCED IN 30 TAC § 116.116(D)(2), ALL CHANGES AUTHORIZED UNDER PBR 147140 TO A PERMITTED FACILITY SHALL BE INCORPORATED INTO THE NSR PERMIT NO. 7711A WHEN IT IS AMENDED OR RENEWED.

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EMISSIONS MODELING CYCLE DONE BY APPLICANT		
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PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)		
WORKING DRAFT PERMIT REVIEW CYCLE		
WPO FINAL PACKAGE CYCLE		

Permit Unit Type:



12700 Park Central Drive | Suite 2100 | Dallas, TX 75251 | P (972) 661-8100 | F (972) 385-9203

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Consultants

February 8, 2018

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
12100 Park 35 Circle, MC 161
Building C, Third Floor, Room 300W
Austin, TX 78753

AIR PERMITS DIVISION
FEB 09 2018
RECEIVED

Re: New Source Review (NSR) Permit Alteration Request – Blowstill T26 Replacement Project

NSR Permit No. 7711A

Building Materials Investment Corporation – Dallas Plant – Dallas, TX, Dallas County

Customer Reference Number (CN) 605251487

Regulated Entity Reference Number (RN) 100788959



Dear APIRT:

Building Materials Investment Corporation doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). Operations at GAF Dallas Plant are authorized under New Source Review (NSR) Permit No. 7711A, Standard Permit No. 91414 and several Permits by Rule (PBRs). The Dallas Plant is a Title V facility operating under Site Operating Permit (SOP) No. O-2771.

On February 7, 2018, GAF has submitted a permit alteration letter for the proposed baghouse replacement and relocation project for the Sand Application Baghouse (Emission Point Number [EPN] 25). GAF would like to request TCEQ's consideration to assign the same permit reviewer for the other permit alteration submittal to streamline the review process. GAF is submitting separate permit alteration requests since these are two separate projects.

PROPOSED PROJECT

The blowstills at the Dallas Plant are used to blow air through heated asphalt flux to achieve desired asphalt properties for asphalt coating process. The emissions from the air blowing process from the blowstills are routed to the thermal oxidizer. The hot exhaust gases from the thermal oxidizer are either vented to atmosphere from the thermal oxidizer exhaust stack (EPN 8) or are ducted to a waste heat boiler (EPN 8A) to produce steam for the facility. One of the existing blowstills (Facility Identification Number [FIN]: T26) is currently near the end of its life and replacement of this blowstill is required to maintain the current process performance and productions. With this submittal, GAF proposes to replace the blowstill T26 with a new blowstill. Although the new blowstill will use a slightly larger vessel compared to the existing blowstill, the proposed project meets the NSR permit alteration requirements due to the following:

- The new blowstill functions in similar manner as the existing blowstill;
- There will be no change in the actual asphalt throughput, asphalt blow loss or asphalt production rate. Therefore, there will be no change to the actual or potential emissions or the character of emissions as result of the proposed replacement project; and
- There is no change to the method of emission control. The emissions from the blowstill will continue to be controlled by the thermal oxidizer.

HEADQUARTERS >

12700 Park Central Drive | Suite 2100 | Dallas, TX 75251 | P (972) 661-8100 | F (972) 385-9203

North America | Europe | Middle East | Asia

The requirements for authorization of the proposed project through permit alteration are addressed below. The permit alteration requirements found in Title 30 of the Texas Administrative Code (30 TAC) §116.116(c) are included in *italics*.

COMPLIANCE WITH 30 TAC §116.116(C)

- 116.116(c)(1) *A permit alteration is:*
(A) a decrease in allowable emissions; or
(B) any change from a representation in an application, general condition, or special condition in a permit that does not cause:
(i) a change in the method of control of emissions;
(ii) a change in the character of emissions; or
(iii) an increase in the emission rate of any air contaminant.

The proposed blowstill replacement project will not result in change of allowable emissions. The proposed project is a change in representation in permit application that will not cause a change in the method of control of emissions, the character of emissions or the emission rate of any contaminant.

- 116.116(c)(2) *Requests for permit alterations that must receive prior approval by the executive director are those that:*
(A) result in an increase in off-property concentrations of air contaminants;
(B) involve a change in permit conditions; or
(C) affect facility or control equipment performance.

The proposed project does not result in an increase in off-property concentration of air contaminants since the actual and allowable emissions, character of emissions or stack parameters of control equipment will remain unchanged.

Changes in permit conditions are not required by the proposed project. The affected control equipment performance will not to change as a result of the proposed project.

- 116.116(c)(3) *The executive director shall be notified in writing of all other permit alterations not specified in paragraph (2) of this subsection.*

GAF is submitting this letter to notify the executive director in writing of the proposed project and to request prior approval by the executive director for the proposed project.

- 116.116(c)(4) *A request for permit alteration shall include information sufficient to demonstrate that the change does not interfere with the owner or operator's previous demonstrations of compliance with the requirements of §116.111(a)(2)(C) of this title.*

The proposed project does not result in change in actual or allowable emissions or the thermal oxidizer performance. Therefore, the proposed project will not interfere with previous demonstration of compliance with 30 TAC §116.111(a)(2)(C), *Best Available Control Technology*.

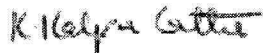
- 116.116(c)(5) *Permit alterations are not subject to the requirements of §116.111(a)(2)(C) of this title.*

GAF understands that permit alterations are not subject to the requirements of 30 TAC §116.111(a)(2)(C), *Best Available Control Technology*.

If you have any questions regarding this submittal, please feel free to contact me at (972) 661-8100 or via email at lkambham@trinityconsultants.com, or Mr. Kevin Bush, GAF, at (214) 637-8933.

Sincerely,

TRINITY CONSULTANTS



Latha Kambham, Ph.D.
Managing Consultant

cc: Ms. Elizabeth Smith, Air Section Manager, TCEQ Region 4
Ms. Joni Keach, Section Manager, City of Dallas Air Pollution Control Program
Mr. Kevin Bush, GAF
Ms. Lele Bao, Trinity Consultants